

# **ATTACHMENT A**

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER****DO NOT WRITE IN THIS SPACE**

Case

Date Filed

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer Starbucks Corporation		b. Tel. No. 208-318-2212
		c. Cell No.
		f. Fax. No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134  See attached for list of Buffalo- and Rochester- area Starbucks locations	e. Employer Representative Howard Schultz, CEO  Michaela Murphy District Manager mimurphy@starbucks.com	g. e-mail hschultz@starbucks.com
		h. Number of workers employed 500
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (4) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

The above-named Employer, by its officers, agents, and representatives, has violated the Act by, among other things:

On or about September 10, 2022, Starbucks issued 22 subpoenas duces tecum to the Union and 21 individuals, demanding broad categories of information regarding activity protected by the Act, including confidential information. The subpoenas' requests violated the Act. See, e.g., Pain Relief Centers, P.A., 371 NLRB No. 143 (2022).

The Union seeks expedited injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights.

**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**  
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	4e. e-mail gbonadonnajr@rrjb.org

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**  
Workers United, a/w SEIU**6. DECLARATION**

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

Ian Hayes, Attorney

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.  
716-608-3427

Office, if any, Cell No.

Fax No.

e-mail  
ihayes@hayesdolce.com

Hayes Dolce

Address 135 Delaware Ave., Ste. 502, Buffalo, NY 14202

Date 10-5-22

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

**Attachment to Charge Against Employer**

**1.d – Address**

520 Lee Entrance, Buffalo, NY 14228 (UB Commons store);  
1703 Niagara Falls Blvd., Buffalo, NY 14228 (NFB store);  
8100 Transit Rd., Suite 100, Williamsville, NY 14221 (Transit & Maple store);  
933 Elmwood Ave., Buffalo, NY 14222 (Elmwood store);  
235 Delaware Ave., Buffalo, NY 14202 (Delaware & Chippewa store);  
3540 McKinley Pkwy, Buffalo, NY 14219 (McKinley store);  
4770 Transit Rd., Depew, NY 14043 (Transit & French store);  
2730 Delaware Ave., Buffalo, NY 14216 (Delaware & Kenmore store);  
5395 Sheridan Dr., Buffalo, NY 14221 (Williamsville Place store);  
9660 Transit Rd., Suite 101, East Amherst, NY 14051 (Transit Commons store);  
4255 Genesee St., Suite 100, Cheektowaga, NY 14225 (Genesee Street store);  
3235 Southwestern Blvd., Orchard Park, NY 14127 (Orchard Park store);  
5120 Camp Rd., Hamburg, NY 14075 (Camp Road store);  
5265 Main St., Williamsville, NY 14221 (Main Street store);  
1 Walden Galleria K-04, Cheektowaga, NY 14225 (Galleria kiosk);  
1775 Walden Ave., Cheektowaga, NY 14225 (Walden & Anderson store);  
5590 Niagara Falls Blvd., Niagara Falls, NY 14304 (Niagara Falls store);  
6707 Transit Rd. #100, Buffalo, NY 14221 (Transit Regal store);  
3186 Sheridan Dr., Buffalo, NY 14226 (Sheridan & Bailey store);  
3015 Niagara Falls Blvd., Amherst, NY 14228 (East Robinson store);  
3611 Delaware Ave., Tonawanda, NY 14217 (Delaware & Sheridan store).  
2750 Monroe Avenue, Rochester, NY 14618.